

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
	:	
UNITED STATES OF AMERICA	:	
	:	
v.	:	
	:	Case No. 16-cr-00776 (VEC)
ALAIN KALOYEROS, et al.,	:	
	:	
Defendants.	:	
	:	
-----	X	

**NOTICE OF DEFENDANT ALAIN KALOYEROS’  
MOTION TO DISMISS FOR LACK OF VENUE OR, ALTERNATIVELY, TRANSFER**

Defendant Alain Kaloyeros, through counsel, respectfully moves for dismissal of the Indictment as against Dr. Kaloyeros for lack of venue or, alternatively, transfer to the Western District of New York.

Respectfully submitted,

/s/ Michael C. Miller  
Michael C. Miller  
Jeffrey A. Novack  
Katherine M. Dubyak  
David B. Hirsch  
STEPTOE & JOHNSON LLP  
1114 Avenue of the Americas  
New York, New York 10036  
(212) 506-3900

*Counsel for Alain Kaloyeros*

Dated: May 19, 2017